## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

KATIANA SOENEN, TAJA HIRATA-EPSTEIN, CHLOE BURNS, EMMA DENNIS-KNIERIEM, JANE DOES 1-2, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY,

Defendant.

**CLASS ACTION** 

C.A. No. 1:21-cv-00325-JJM-PAS

Jury Trial Demanded

# MOTION OF PLAINTIFFS JANE DOE 1 AND JANE DOE 2 TO PROCEED UNDER PSEUDONYM

For the reasons stated in the accompanying Memorandum of Law in Support of the Motion of Plaintiffs Jane Doe 1 and Jane Doe 2 to Proceed Under Pseudonym, Exhibit A (Declaration of Jane Doe 1), and Exhibit B (Declaration of Jane Doe 2), Plaintiffs Jane Doe 1 and Jane Doe 2 respectfully request that this Court entering an Order allowing them to proceed in the above-captioned action under the pseudonyms "Jane Doe 1" and "Jane Doe 2."

#### **ORAL ARGUMENT**

In accordance with Local Rule Cv 7(c), Plaintiffs do not seek oral argument unless the Court deems it necessary. Plaintiffs estimate no more than one hour would be necessary.

Respectfully submitted,

Dated: February 4, 2022

/s/ Kimberly A. Evans

### **GRANT & EISENHOFER P.A.**

Kimberly A. Evans (*Pro Hac Vice*) Samuel Mukiibi (*Pro Hac Vice*) Carla Agbiro (*Pro Hac Vice*) 123 Justison Street Wilmington, DE 19801 Tel: (302) 622-7000

kevans@gelaw.com smukiibi@gelaw.com cagbiro@gelaw.com

# **GRANT & EISENHOFER P.A.**

M. Elizabeth Graham (*Pro Hac Vice*) 101 California Street, Suite 2710 San Francisco, CA 94111 Tel: (415) 365-9585 egraham@gelaw.com

### **GRANT & EISENHOFER P.A.**

Karin Fisch (*Pro Hac Vice*) 485 Lexington Avenue, 29th Floor New York, NY 10017 Tel: (646) 722-8512 kfisch@gelaw.com

### SALTZ MONGELUZZI AND BENDESKY

Elizabeth A. Bailey (*Pro Hac Vice Forthcoming*) 1650 Market Street, 52nd Floor Philadelphia, PA 19103 Tel: 215-575-3859 ebailey@smbb.com

## LAW OFFICES OF PATRICIA E. ANDREWS

Patricia E. Andrews 38 N. Court Street Providence, RI 02903 Tel: (401) 421-0966 peandrews@verizon.net

ATTORNEYS FOR PLAINTIFFS AND THE PROPOSED CLASS

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of MOTION OF PLAINTIFFS JANE DOE 1 AND JANE DOE 2 TO PROCEED UNDER PSEUDONYM was filed and served electronically through the Court's CM/ECF system on the following counsel of record:

Steven M. Richard (4403)
Nixon Peabody LLP
One Citizens Plaza, Suite 500
Providence, RI 02903
<a href="mailto:srichard@nixonpeabody.com">srichard@nixonpeabody.com</a>
Counsel for Defendant, Brown University

By: /s/ Kimberly A. Evans
Kimberly A. Evans

Dated: February 4, 2022